

GOAL

My goal is to make the PUBLIC airwaves more diverse by allowing individuals, minorities, women, small business organizations, and others with limited financial means to have a PUBLIC VOICE by owning low-power FM broadcast stations throughout America. This is not only my goal, but the real goal of government itself—to provide opportunities for ALL its citizens to voice their opinions and views, even those with limited financial resources. Locally owned and operated businesses of all kinds are a must for true diversity. The LPFM service is no exception, and anything else will defeat its purpose. This is the reason I call for true local ownership restrictions. In order for this to happen, some method of assuring local ownership for LPFM must be worked out; perhaps some form of "first-come, first-served" application process with specified filing windows. If auctions are to be used to select between mutually exclusive (MX) applicants, then there must be some form of substantial "bidding credits" available to individuals, minorities, women, small business, organizations, and others with limited financial means. This would allow such applicants to compete with other entities that have larger financial resources at their disposal. This would allow the diversity of the LPFM service to be maintained, which again, is the GOAL.

LPFM must allow for commercial as well as non-commercial stations. Since some of these stations will most likely be owned by people of limited financial means, it only makes sense to be able to sell commercials to support such stations. Their economic survival may depend on it. Both the 2nd and 3rd adjacent channel restrictions should be dropped for LPFM stations, since these are low power stations, and will not interfere with existing stations or planned digital I.B.O.C. signals. I suggest using a "prohibited contour overlap" method of predicting interference. This would allow for many more LPFM stations to be created nationwide. If the current plan of simple mileage separation is used, we will not have the most efficient use of the spectrum. The prohibited contour overlap method will assure better diversity of ownership in the LPFM service by allowing more stations to use a directional antenna. This would restrict the power in the direction of another station that might otherwise be interfered with. In larger markets, this is a must. THE LARGER MARKETS ARE WHERE DIVERSITY IS NEEDED THE MOST.

Thanks,
John McClung